2:11-cv-10090-VAR-MKM Doc#2 Filed 01/07/11 Pg 1 of 50 Pg ID 9 123

ELL AVB

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA: THE STATES OF ILLINOIS, INDIANA, MICHIGAN; ex rel. Anne E. Mitchell, individually;

Plaintiffs,

٧.

United Medical Systems (DE), Inc., a Delaware corporation; UMS Lithotripsy Management, LLC, a Tennessee limited liability company; Great Lakes Lithotripsy, LLC, a Michigan limited liability company; UMS Lithotripsy Services of Mishawaka, LLC, a Delaware limited liability company; Richard Abramson, an individual; Muzammil Ahmed, an individual; Mohammed R. Al-Ansari, an individual; Nitin Ambani, an individual; Joseph Aquilina, an individual; Antony Attie, an individual; Robert A. Badalament, an individual; John Bannow, an individual; John Bauer, an individual; Michael Beer, an individual; David Bloom, an individual; Mandell Bookman, an individual; James Boutrous, an individual; Barry Breakey, an individual; David Brickel, an individual; Aditya Bulusu, an individual; David Burks, an individual; Joseph Cerny, an individual; Michael Louis Cher, an individual; Michael Cotant, an individual; Douglas Cummings, an individual; John Damiani, an individual; Willard DeBraber, an individual; Albert DePolo, Jr., an individual; Robert Di Loreto, an individual; Robert Dimitrou, an individual; Richard Dorr, an individual; Jean Claude Elie, an individual; Jason Evans, an individual; Gary Faerber, an individual; Tewodros Fesseha, an individual; C. Peter Fischer, an individual; Rene Frontera, an individual; Valal George, an individual; Scott Gilbert, an individual; Ward Gillett, an individual; Keow Mei Goh, an individual; Marko Gudziak, an individual; Brian Guz, an individual; Khaled

Civil Action No:10-

FILED UNDER SEAL **PURSUANT TO** 31 U.S.C. § 3730(b)(2)

Case: 2:11-cv-10090

Assigned To: Roberts, Victoria A Referral Judge: Maizoub, Mona K Assign. Date: 1/7/2011 @ 3:27PM Description: SEALED MATTER

JURY TRIAL DEMANDED

1:10-cv-06793 Judge James F. Holderman Magistrate Judge Jeffrey T. Gilbert

FILED

OCT 2 1 2010

MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT Hafez, an individual; Mahmood Hai, an individual; John Hall, an individual; Robert Michael Hall, an individual; John Harb, an individual; John Harding, an individual; David L. Harold, an individual; Michael J. Harris, an individual; John Herschman, an individual; Michael Hoff, an individual; Brent Hollenbeck, an individual; Mitchell Hollander, an individual; Frank Holloway, an individual; James Howard, an individual; Steven Jensen, an individual; David Johnson, an individual; Velji Kansara, an individual; Phadej Keopunna, an individual; Kenneth Kernen, an individual; Glenn Kershen, an individual; Babiano Kim, an individual; Frank Kim, an individual; Eduardo Kleer, an individual; Earl Koenig, an individual; Steven W. Kowalsky, an individual; Harm Kraai, an individual; Surendra M. Kumar, an individual; Anil B. Kumar, an individual; John Lanesky, an individual; Jerilyn Latini, an individual; David Law, an individual; Cheryl Lee, an individual; Stephen Liroff, an individual; Ray Littleton, an individual; Michael Macksood, an individual; Rabii Madi, an individual; Conrad Maitland, an individual; Shiva Maralani, an individual; Sabry George Mansour, an individual; Joseph Mashni, an individual; Edward McGuire, an individual; Timothy McHugh, an individual; Gregory McIntosh, an individual; James McMurty, an individual; Mani Menon, an individual; Stephanie Meyers, an individual; Richard Mills, an individual; Keith Miyamoto, an individual; James Montie, an individual; Bradford Murphy, an individual; William Nutting, an individual; Dana Ohl, an individual; Greg Oldford, an individual; John Park, an individual; James Peabody, an individual; Tony Pinson, an individual; Darryl Reaume, an individual; Claude Reitleman, an individual; Kandis Kumasi Rivers, an individual; William Roberts, an individual; Hector Y. Rodriguez, an individual; Steven Roth, an individual; Harold Rutila, an individual; Talal Samhan, an individual; Alphonse Santino, an individual; Richard Anthony Santucci, an individual; Edward Schervish, an individual; Jeffrey Schock, an individual; Timothy Schuster,

an individual; Meena Shah, an individual; Bryan Shumaker, an individual; Ajay Kumar Singla, an individual; Anvita Sinha, an individual; Scott I. Sircus, an individual; Jennifer Sobol, an individual; M. Hughes Solomon, an individual; Jay Starr, an individual; Wayne K. Stefanciw, an individual; Eric Stockall, an individual; Hans Stricker, an individual; Brian Stirling, an individual; Stephen A. Stuppler, an individual; John Suleskey, an individual; Jonathan P. Sykes, an individual; Abdul Hadi Tabbaa, an individual; Anita Tekchandani, an individual; David Terhune, an individual; Eric Todd, an individual; Howard Topley, an individual; George Torriglia, an individual; Jeffrey Alan Triest, an individual; Willie Underwood, III, an individual; Howard Usitalo, an individual; Carl Van Appledorn, an individual; Ronald Wadle, an individual; Julian Wan, an individual; Stephen Wang, an individual; David Wartinger, an individual; John Wei, an individual; Alon Weizer, an individual; Stuart Wolf, an individual; David Wood, an individual; Rafid H. Yousif, an individual; Leonard Zuckerman, an individual; Bay Regional Medical Center; Bon Secours Grosse Pointe dba (previously named Bon Secours Cottage Health Services) dba Bon Secours Hospital and as Cottage Hospital; Botsford General Hospital; Bronson Methodist Hospital; Covenant Medical Center, Inc.; Edward W. Sparrow Hospital Association dba Sparrow Hospital; Emma L. Bixby Medical Center dba Bixby Medical Center; Garden City Hospital; Genesys Regional Medical Center; Harper-Hutzel Hospital; Henry Ford Health Systems dba Cottage Hospital, Henry Ford Bi-County Hospital, Henry Ford Hospital, Henry Ford West Bloomfield and Henry Ford Wyandotte Hospital; Henry Ford Macomb Hospital Corporation dba St. Joseph Mercy Macomb; Huron Memorial Hospital dba Huron Medical Center; Huron Valley Hospital, Inc. dba Huron Valley Sinai Hospital, Ingham Regional Medical Center dba Mid-Michigan Medical Center; Lakeland Hospitals at Niles and St. Joseph, Inc. dba Lakeland Hospital; St. Joseph; Lapeer Regional Medical Center; McLaren Health Care

Corporation; Memorial Medical Center of West Michigan; Metropolitan Hospital; Mount Clemens Regional Medical Center (previously named Mount Clemens General Hospital, Inc.); Munson Medical Center; Northern Michigan Hospital, Inc. dba Northern Michigan Hospital; Oakwood Annapolis Hospital, Inc. dba Oakwood Annapolis Hospital; Oakwood Hospital and Medical Center dba Oakwood Healthcare, Inc. dba Oakwood Southshore Medical Center; Pontiac Osteopathic Hospital dba POH Medical Center; Regents of the University of Michigan dba University of Michigan Health Systems, C.S. Mott Children's Hospital, University of Michigan Ann Arbor Surg. Ctr and University of Michigan-Livonia; Sinai Hospital of Greater Detroit dba Sinai-Grace Hospital; St. John Hospital and Medical Center dba St. John Surgery Center, St. John Hospital-Macomb Township Center, and St. John North Shores Hospital; St. Mary's of Michigan dba St. Mary's Medical Center-Saginaw; The Memorial Hospital dba Memorial Healthcare; Trinity Health-Michigan dba Chelsea Community Hospital, Mercy General Health Partners, Mercy Hospital Cadillac, Mercy Hospital Port Huron, St. Joseph Mercy Oakland, St. Joseph Mercy Ann Arbor and St. Mary Mercy Hospital; W. A. Foote Memorial Hospital; Stephen P. Guss, an individual; Scott Rutchik, an individual; St. Joseph Community Hospital of Mishawaka, an Indiana nonprofit corporation; American Kidney Stone Management, Ltd., an Ohio limited liability company; Greater Michigan Lithotripsy, LLC, a Delaware limited liability company; Henry Dale Alkema, an individual; John G. Anema, an individual; Anthony N. Avallone, an individual; Edward E. Barton, an individual; Robert J. Bates, an individual; Glenn G. Betrus, an individual; Jayant D. Bhat, an individual; Dianne Bigham, an individual; Gregor W. Blix, an individual; Jonathan Todd Bolthouse, an individual; James B. Bour, an individual; Kevin Brewton, an individual; Todd Garrison Campbell, an individual; George G. Carothers, an individual; Jeffrey B. Casamento, an individual; Jeffrey P. Chapman, an individual; Randy M. Chudler, an

individual; Lucy A. Coccimiglio, an individual; Thomas A. Coury, an individual; William Davidson, an individual; Willard P. Debraber, an individual; Ananias C. Diokno, an individual; Brian Drabik, an individual; Caleb John Fleming, an individual; Anthony Raymond Gauthier, Jr., an individual; Sity M. Girgis, an individual; Kenneth A. Goldman, an individual; Arthur L. Golin, an individual; Jose A. Gonzalez, an individual; Douglas H. Green, an individual; Jeffrey Lorenz Greski, an individual; Mark L. Hammel, an individual; Philip T. Hoekstra, an individual; Jay B. Hollander, an individual; Patrick M. Hurley, an individual; Robert R. Isacksen, an individual; Farid Jano, an individual; Richard Kahnoski, an individual; Marshall Kamer, an individual; Evan J. Kass, an individual; David James Kearney, an individual; Charles M. Keoleian, an individual; John Harrison Kopchick, an individual; Howard J. Korman, an individual; Joel M. Kriegel, an individual; Kevin Michael Kronner, an individual; Randall S. Kuntzman, an individual; Leonard J. Kurello, an individual; Zvi Levran, an individual; Kenneth Lim, an individual; John Rohan Lobo, an individual; Jay Matthew Lonsway, an individual; Mark A. Lucas, an individual; John K. Ludlow, an individual; Michael D. Lutz, an individual; Thomas J. Maatman, an individual; Willaim E. Marquis, an individual; William J. McDevitt, an individual; Mark C. McQuiggan, an individual; Thomas Mertz, an individual; Donald F. Moylan, Jr., an individual; Pradeep Nagaraju, an individual; Michael E. Novak, an individual; Kenneth M. Peters, an individual; Ashok Y. Reddy, an individual; James D. Relle, an individual; Louis C. Remynse, an individual; Stephen B. Reznicek, an individual; Paul N. Rodriguez, an individual; Hector Y. Rodriguez, an individual; Brian A. Roelof, an individual; Bradley H. Rosenberg, an individual; Ronald Allen Rubenstein, an individual; Joseph A. Salisz, an individual; Brian D. Seifman, an individual; Sugandh D. Shetty, an individual; Kenneth F. Shockley, an individual; Larry T. Sirls, an individual; Thompson H. Southwell, an individual; James B. Smith, an individual;

William F. Spencer, an individual; George)
Steinhardt, an individual; Kevin T. Stone, an)
individual; Brian Robert Stork, an individual;)
Phillip B. Storm, an individual; Patrick J.)
Sweeney, an individual; Dinesh John Telang, an)
individual; David Edward Thompson, an)
individual; Michael Arthur Traver, an individual;)
Kirit K. Vora, an individual; Douglas J.)
Walvoord, an individual; Jeffrey L. Weingarten,)
an individual; Bradley L. Willoughby, an)
individual; Raymond J. Winfield, Jr., an)
individual; Phillip G. Wise, an individual;,)
Borgess Medical Center; Hackley Hospital;	1)
Holland Community Hospital; North Ottawa)
Community Hospital; Port Huron Hospital;)
Providence Hospital and Medical Center, Inc. dba)
Providence Hospital and Medical Center;)
Spectrum Health Hospitals; Spectrum Health)
Kelsey dba Kelsey Memorial Health Center; St.)
John River District Hospital; Trinity Health-)
Michigan dba Lakeshore Surgery Center; William	j.
Beaumont Hospital; HealthTronics, a Texas	Ś
Corporation; Lincolnland Lithotripsy, LLC, a	Ś
Delaware limited liability company; United	<u> </u>
Shockwave Therapies, LLC, a Delaware limited	ń
liability company; United Shockwave Services,	
Ltd., an Illinois corporation; Advocate Health and	,)
Hospitals Corporation, an Illinois not-for-profit	-)
corporation; Morris Hospital, an Illinois not-for-)
profit corporation; Katherine Shaw Bethea) \
)
Hospital, an Illinois not-for-profit corporation;)
VHS Westlake Hospital, Inc. a Delaware limited	-)
liability company; Joel Slutsky, an individual; and)
John Does 1-10000,)
D. C. 1)
Defendants.)
)
)
) [

FALSE CLAIMS ACT COMPLAINT AND DEMAND FOR JURY TRIAL

FILING UNDER SEAL

- 1. Under the federal False Claims Act and the states false claims acts, as defined and more specifically listed below, this complaint is to be filed in camera and remain under seal for a period of at least sixty (60) days and shall not be served on defendants until the Court so orders. The government may elect to intervene and proceed with the action within sixty (60) days after it receives the Complaint.
- 2. As required by the False Claims Act, Relator voluntarily submitted prior to the filing of this complaint, a confidential written disclosure statement (subject to the attorney-client and common interest privileges) to the United States Government containing material evidence and information in her possession pertaining to the allegations contained in this complaint.

DESCRIPTION OF SCHEME

- 3. This case involves kickback arrangements between lithotripsy services companies owned by urologists ("UOL Partnerships") and the hospitals in which these urologists perform lithotripsy and designated health services.
- 4. The urologists tie the rental of lithotripsy equipment and skilled technicians (i.e., lithotripsy services) from their UOL Partnership to their own referrals of designated health services ("DHS") to the hospitals. These DHS referrals include inpatient services, outpatient services and diagnostic tests.
- 5. In short, the urologists enter into a quid pro quo referral arrangement with the hospitals. If the hospitals will not contract with the urologist-owned lithotripsy company, the urologists will not refer patients to the hospitals for DHS.
 - 6. Since at least 2003, this scheme has dominated the mobile lithotripsy industry.

7. As a result of the scheme, the Syndicators, the Host Hospitals, Urologists, Lithotripsy Management Companies and UOL Partnerships (all as defined below) violated the Anti-Kickback Statute, Stark Law and other regulations. All payments made by federal and state health care programs for the lithotripsy services and equipment, as well as the payments made for inpatient and outpatient services referred by Urologists, were fraudulent.

JURISDICTION AND VENUE

- 8. This action arises under 31 U.S.C. § 3729 *et seq.*, also known as the False Claims Act (the "Act") and the common law to recover treble damages and civil penalties on behalf of the United States of America arising out of the Defendants' violations of the Act.
- 9. Under § 3732 of the Act, this Court has exclusive jurisdiction over actions brought under the Act and concurrent jurisdiction over state claims arising from the transactions giving rise to claims under the Act. Furthermore, jurisdiction over this action is conferred on this Court by 28 U.S.C. § 1331 because this civil action arises under the laws of the United States.
- 10. This Court has supplemental jurisdiction over all other claims set forth in this Complaint because these claims are so related to the claims arising under the Federal False Claims Act that they form part of the same case or controversy. 28 U.S.C. § 1367.
- 11. Venue is proper in this district pursuant to § 3732(a) of the Act, which provides that "any action under § 3730 may be brought in any judicial district in which the Defendant, or in the case of multiple Defendants, any one Defendant can be found, resides, transacts business, or in which any act prescribed by § 3739 occurred." The acts, which are the subject of this action, occurred in the State of Illinois, among other states, within this judicial district. At all times material hereto, Defendants UMS and UMS-LM regularly conducted substantial business within the State of Illinois, maintained permanent employees who had an office within the State of Illinois, or

made and is making significant revenue based upon its business activities within the State of Illinois, within this judicial district. Additionally, venue is proper in this district pursuant to 28 U.S.C. § 1391 (b)(1)-(2).

12. The state False Claims Act and whistleblower claims are filed pendant to the federal claims.

PARTIES

- 13. Relator Anne E. Mitchell is a resident of the State of Illinois and the former regional business development manager for Defendant UMS, a wholly owned subsidiary of United Medical Systems International AG, a company publicly traded on the German stock exchange. Relator Mitchell was an executive required to develop, promote, and implement the physician ownership business model but did not know such business model was illegal.
- 14. Relator is an original source of the facts and information hereinafter set forth concerning the activities of the Defendants. The facts averred herein are based upon her personal observations and documents in her possession.
- 15. The term Defendant UOL Partnership refers to an entity, owned in whole or in part by urologists, named as a defendant that rents lithotripsy equipment and, in some cases, trained technicians as well, under contract with a hospital or ambulatory service centers ("ASCs") which uses the equipment and technician to perform lithotripsy and is named as a defendant.
- 16. The term Defendant Urologist refers to a defendant who is a licensed physician and who owns an interest in a Defendant UOL Partnership and is named as a defendant.
- 17. The term Defendant Host Hospital refers to a hospital or ambulatory surgical center that has a contract with an UOL Partnership and is named as a defendant.

- 18. Defendant United Medical Systems (DE), Inc., is a Delaware corporation which is headquartered at 1500 West Park Drive, Suite 390, Westborough, MA 01581. UMS sells a variety of transportable medical services including shockwave lithotripsy. It is one of the largest lithotripsy providers in the United States.
- 19. Defendant UMS Lithotripsy Management, LLC is a Tennessee limited liability company ("UMS-LM"), headquartered at 1500 West Park Drive, Suite 390, Westborough, MA 01581. UMS-LM is a wholly owned subsidiary of Defendant UMS. UMS-LM is principally engaged in the management of various companies or corporations that provide lithotripsy equipment and trained technicians to assist in operating the lithotripsy equipment to hospitals and ambulatory surgical centers ("ASCs").
- 20. Defendant Great Lakes Lithotripsy, LLC is a Michigan limited liability company ("GLL") with a registered office at 712 Abbott Road, East Lansing, MI 48823. GLL is owned by UMS and over 120 physicians who specialize in the practice of urology. Each of the physician owners of GLL is named as a Defendant in this case.
- 21. The "Defendant GLL Urologists" include the defendants listed in paragraphs 22 through 166 and any John Doe Defendants who are physicians and who, directly or indirectly, own a membership interest in GLL.
- 22. Defendant Richard Abramson is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 23. Defendant Muzammil Ahmed is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 24. Defendant Mohammed R. Al-Ansari is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 25. Defendant Nitin Ambani is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 26. Defendant Joseph Aquilina is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 27. Defendant Antony Attie is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 28. Defendant Robert A. Badalament is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 29. Defendant John Bannow is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 30. Defendant John Bauer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 31. Defendant Michael Beer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 32. Defendant David Bloom is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 33. Defendant Mandell Bookman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 34. Defendant James Boutrous is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 35. Defendant Barry Breakey is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 36. Defendant David Brickel is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 37. Defendant Aditya Bulusu is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 38. Defendant David Burks is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 39. Defendant Joseph Cerny is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 40. Defendant Michael Louis Cher is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 41. Defendant Michael Cotant is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 42. Defendant Douglas Cummings is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 43. Defendant John Damiani is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 44. Defendant Willard DeBraber is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 45. Defendant Albert DePolo, Jr. is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 46. Defendant Robert Di Loreto is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 47. Defendant Robert Dimitrou is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 48. Defendant Richard Dorr is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 49. Defendant Jean Claude Elie is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 50. Defendant Jason Evans is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 51. Defendant Gary Faerber is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 52. Defendant Tewodros Fesseha is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 53. Defendant C. Peter Fischer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 54. Defendant Caleb John Fleming is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 55. Defendant Rene Frontera is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 56. Defendant Valal George is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 57. Defendant Scott Gilbert is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 58. Defendant Ward Gillett is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 59. Defendant Keow Mei Goh is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 60. Defendant Marko Gudziak is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 61. Defendant Brian Guz is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 62. Defendant Khaled Hafez is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 63. Defendant Mahmood Hai is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 64. Defendant John Hall is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 65. Defendant Robert Michael Hall is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 66. Defendant John Harb is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 67. Defendant John Harding is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 68. Defendant David L. Harold is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 69. Defendant Michael J. Harris is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 70. Defendant John Herschman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 71. Defendant Michael Hoff is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 72. Defendant Brent Hollenbeck is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 73. Defendant Mitchell Hollander is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 74. Defendant Frank Holloway is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 75. Defendant James Howard is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 76. Defendant Steven Jensen is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 77. Defendant David Johnson is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 78. Defendant Velji Kansara is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 79. Defendant Phadej Keopunna is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 80. Defendant Kenneth Kernen is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 81. Defendant Glenn Kershen is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 82. Defendant Babiano Kim is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 83. Defendant Frank Kim is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 84. Defendant Eduardo Kleer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 85. Defendant Earl Koenig is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 86. Defendant Steven W. Kowalsky is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 87. Defendant Harm Kraai is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 88. Defendant Surendra M. Kumar is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 89. Defendant Anil B. Kumar is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 90. Defendant John Lanesky is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 91. Defendant Jerilyn Latini is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 92. Defendant David Law is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 93. Defendant Cheryl Lee is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 94. Defendant Stephen Liroff is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 95. Defendant Ray Littleton is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 96. Defendant Jay Matthew Lonsway is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 97. Defendant Michael Macksood is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 98. Defendant Rabii Madi is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 99. Defendant Conrad Maitland is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 100. Defendant Shiva Maralani is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 101. Defendant Sabry George Mansour is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 102. Defendant Joseph Mashni is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 103. Defendant Edward McGuire is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 104. Defendant Timothy McHugh is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 105. Defendant Gregory McIntosh is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 106. Defendant James McMurty is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 107. Defendant Mani Menon is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 108. Defendant Stephanie Meyers is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 109. Defendant Richard A. Mills is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 110. Defendant Keith Miyamoto is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 111. Defendant James Montie is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 112. Defendant Bradford Murphy is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 113. Defendant William Nutting is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 114. Defendant Dana Ohl is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 115. Defendant Greg Oldford is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 116. Defendant John Park is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 117. Defendant James Peabody is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 118. Defendant Tony Pinson is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 119. Defendant Darryl Reaume is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 120. Defendant Claude Reitleman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 121. Defendant Kandis Kumasi Rivers is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 122. Defendant William Roberts is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 123. Defendant Hector Y. Rodriguez is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 124. Defendant Steven Roth is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 125. Defendant Harold Rutila is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 126. Defendant Talal Samhan is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 127. Defendant Alphonse Santino is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 128. Defendant Richard Anthony Santucci is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 129. Defendant Edward Schervish is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 130. Defendant Jeffrey Schock is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 131. Defendant Timothy Schuster is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 132. Defendant Meena Shah is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 133. Defendant Bryan Shumaker is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 134. Defendant Ajay Kumar Singla is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 135. Defendant Anvita Sinha is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 136. Defendant Scott I. Sircus is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 137. Defendant Jennifer Sobol is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 138. Defendant M. Hughes Solomon is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 139. Defendant Jay Starr is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 140. Defendant Wayne K. Stefanciw is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 141. Defendant Eric Stockall is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 142. Defendant Hans Stricker is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 143. Defendant Brian Stirling is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 144. Defendant Stephen A. Stuppler is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 145. Defendant John Suleskey is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 146. Defendant Jonathan P. Sykes is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 147. Defendant Abdul Hadi Tabbaa is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 148. Defendant Anita Tekchandani is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 149. Defendant David Terhune is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 150. Defendant Eric Todd is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 151. Defendant Howard Topley is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 152. Defendant George Torriglia is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 153. Defendant Jeffrey Alan Triest is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 154. Defendant Willie Underwood, III is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 155. Defendant Howard Usitalo is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 156. Defendant Carl Van Appledorn is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is an resident of the state of Michigan.

- 157. Defendant Ronald Wadle is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 158. Defendant Julian Wan is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 159. Defendant Stephen Wang is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 160. Defendant David Wartinger is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 161. Defendant John Wei is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 162. Defendant Alon Weizer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 163. Defendant Stuart Wolf is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.

- 164. Defendant David Wood is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 165. Defendant Rafid H. Yousif is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 166. Defendant Leonard Zuckerman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GLL. This defendant is a resident of the state of Michigan.
- 167. The Defendant "GLL Host Hospitals" include the hospitals and ASCs identified in paragraphs 168 though 200 and any John Doe Defendants which are hospitals or ASCs and which have a contract with GLL for the provision of lithotripsy services.
- 168. Defendant Bay Regional Medical Center is a Michigan nonprofit corporation with a registered office at 1900 Columbus Avenue, Bay City, MI 48708. Defendant Bay Regional Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 169. Defendant Bon Secours Grosse Pointe (previously named Bon Secours Cottage Health Services) is a Michigan nonprofit corporation with a registered office at 601 Abbot Road, East Lansing, MI 48823. Defendant Bon Secours Grosse Pointe does business as Bon Secours Hospital and as Cottage Hospital. Defendant Bon Secours Grosse Pointe furnishes lithotripsy to patients under arrangements with GLL.
- 170. Defendant Botsford General Hospital is a Michigan nonprofit corporation with a registered office at 28050 Grand River Avenue, Farmington Hills, MI 48336-5933. Defendant Botsford General Hospital furnishes lithotripsy to patients under arrangements with GLL.

- 171. Defendant Bronson Methodist Hospital is a Michigan nonprofit corporation with a registered office at 301 John Street, Kalamazoo, MI 49007. Defendant Bronson Methodist Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 172. Defendant Covenant Medical Center, Inc. is a Michigan nonprofit corporation with a registered office at c/o Covenant Medical Center, Inc., 1447 N. Harrison, Saginaw, MI 48602. Defendant Covenant Medical Center, Inc. furnishes lithotripsy to patients under arrangements with GLL.
- 173. Defendant Edward W. Sparrow Hospital Association is a Michigan nonprofit corporation with a registered office at 1215 E. Michigan Avenue, Lansing, MI 48912. Defendant Edward W. Sparrow Hospital Association does business as Sparrow Hospital. Defendant Edward W. Sparrow Hospital Association furnishes lithotripsy to patients under arrangements with GLL.
- 174. Defendant Emma L. Bixby Medical Center is a Michigan nonprofit corporation with a registered office at 818 Riverside Avenue, Adrian, MI 49221. Defendant Emma L. Bixby Medical Center does business as Bixby Medical Center. Defendant Emma L. Bixby Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 175. Defendant Garden City Hospital is a Michigan nonprofit corporation with a registered office at 6245 N. Inkster Road, Garden City, MI 48135. Defendant Garden City Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 176. Defendant Genesys Regional Medical Center is a Michigan nonprofit corporation with a registered office at One Genesys Pky, Grand Blanc, MI 48439-1477. Defendant Genesys Regional Medical Center furnishes lithotripsy to patients under arrangements with GLL.

- 177. Defendant Harper-Hutzel Hospital is a Michigan nonprofit corporation with a registered office at 3990 John R, Detroit, MI 48201. Defendant Harper-Hutzel Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 178. Defendant Henry Ford Health Systems a Michigan nonprofit corporation with a registered office at 1 Ford Place, Suite 5B, Detroit, MI 48202. Defendant Henry Ford Health Systems does business as Cottage Hospital, Henry Ford Bi-County Hospital, Henry Ford Hospital, Henry Ford West Bloomfield, and Henry Ford Wyandotte Hospital. Defendant Henry Ford Health Systems furnishes lithotripsy to patients under arrangements with GLL.
- 179. Defendant Henry Ford Macomb Hospital Corporation is a Delaware Corporation authorized to do business in Michigan with a registered office at 1 Ford Place, Suite 5B, Detroit, MI 48202. Defendant Henry Ford Macomb Hospital Corporation does business as St. Joseph Mercy Macomb. Defendant Henry Ford Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 180. Defendant Huron Memorial Hospital is a Michigan nonprofit corporation with a registered office at 1100 S. VanDyke, Bad Axe, MI 48413. Defendant Huron Memorial Hospital does business as Huron Medical Center. Defendant Huron Memorial Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 181. Defendant Huron Valley Hospital, Inc. is a Michigan nonprofit corporation with a registered office at 1 William Carls Drive, Commerce, MI 48382. Defendant Huron Valley Hospital, Inc. does business as Huron Valley Sinai Hospital. Defendant Huron Valley Hospital, Inc. furnishes lithotripsy to patients under arrangements with GLL.
- 182. Defendant Ingham Regional Medical Center is a Michigan nonprofit corporation with a registered office at 401 Greenlawn Avenue, Lansing, MI 48910. Defendant Ingham

Regional Medical Center does business as dba Mid-Michigan Medical Center. Defendant Ingham Regional Medical Center furnishes lithotripsy to patients under arrangements with GLL.

- 183. Defendant Lakeland Hospitals at Niles and St. Joseph, Inc. is a Michigan nonprofit corporation with a registered office at 1234 Napier Avenue, St. Joseph, MI 49085. Defendant Lakeland Hospitals at Niles and St. Joseph, Inc. does business as Lakeland Hospital, St. Joseph. Defendant Lakeland Hospitals at Niles and St. Joseph, Inc. furnishes lithotripsy to patients under arrangements with GLL.
- 184. Defendant Lapeer Regional Medical Center is a Michigan nonprofit corporation with a registered office at 1375 N. Main Street, Lapeer, MI 48446. Defendant Lapeer Regional Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 185. Defendant McLaren Health Care Corporation is a Michigan nonprofit corporation with a registered office at G3235 Beecher Road, Suite B, Flint, MI 48532. Defendant McLaren Health Care Corporation furnishes lithotripsy to patients under arrangements with GLL.
- 186. Defendant Memorial Medical Center of West Michigan is a Michigan nonprofit corporation with a registered office at 1 Atkinson Drive, Ludington, MI 49432. Defendant Memorial Medical Center of West Michigan furnishes lithotripsy to patients under arrangements with GLL.
- 187. Defendant Metropolitan Hospital is a Michigan nonprofit corporation with a registered office at 5900 Byron Center Avenue, S.W. Wyoming, MI 49509. Defendant Metropolitan Hospital furnishes lithotripsy to patients under arrangements with GLL.
- 188. Defendant Mount Clemens Regional Medical Center (previously named Mount Clemens General Hospital, Inc.) is a Michigan nonprofit corporation with a registered office at 1000

Harrington Blvd., Mount Clemens MI 48043. Defendant Mount Clemens Regional Medical Center furnishes lithotripsy to patients under arrangements with GLL.

- 189. Defendant Munson Medical Center is a Michigan nonprofit corporation with a registered office at 1105 Sixth Street, Traverse City, MI 49684. Defendant Munson Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 190. Defendant Northern Michigan Hospital, Inc. is a Michigan nonprofit corporation with a registered office at 416 Connable Avenue, Petoskey, MI 49770. Defendant Northern Michigan Hospital, Inc. does business as Northern Michigan Hospital. Defendant Northern Michigan Hospital, Inc. furnishes lithotripsy to patients under arrangements with GLL.
- 191. Defendant Oakwood Annapolis Hospital, Inc. is a Michigan nonprofit corporation with a registered office at 30600 Telegraph Road, Suite 2345 Bingham Farms, MI 48025. Defendant Oakwood Annapolis Hospital, Inc. does business as Oakwood Annapolis Hospital. Defendant Oakwood Annapolis Hospital, Inc. furnishes lithotripsy to patients under arrangements with GLL.
- 192. Defendant Oakwood Hospital and Medical Center is a Michigan nonprofit corporation with a registered office at 30600 Telegraph Road, Suite 2345 Bingham Farms, MI 48025. Defendant Oakwood Hospital and Medical Center does business as Oakwood Healthcare, Inc. and Oakwood Southshore Medical Center. Defendant Oakwood Hospital and Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 193. Defendant Pontiac Osteopathic Hospital is a Michigan nonprofit corporation with a registered office at 50 N. Perry Street, Pontiac, MI 48058. Defendant Pontiac Osteopathic Hospital does business as POH Medical Center. Defendant Pontiac Osteopathic Hospital furnishes lithotripsy to patients under arrangements with GLL.

- 194. Defendant Regents of the University of Michigan is a Michigan body corporate with the authority to be sued. The University of Michigan is headquartered at 2013 Fleming Administration Building, 503 Thompson Street, Ann Arbor, MI 48109-1340. Defendant Regents of the University of Michigan owns and operates C.S. Mott Children's Hospital, University of Michigan Ann Arbor Surg. Ctr and University of Michigan-Livonia, each of whom furnishes lithotripsy to patients under arrangements with GLL.
- 195. Defendant Sinai Hospital of Greater Detroit is a Michigan nonprofit corporation with a registered office at 6767 W. Outer Drive, Detroit, MI 48235. Defendant Sinai Hospital of Greater Detroit does business as Sinai-Grace Hospital. Defendant Sinai Hospital of Greater Detroit furnishes lithotripsy to patients under arrangements with GLL.
- 196. Defendant St. John Hospital and Medical Center is a Michigan nonprofit corporation with a registered office at 28000 Dequindre, Warren, MI 48092. Defendant St. John Hospital and Medical Center does business as St. John Surgery Center, St. John Hospital-Macomb Township Center, and St. John North Shores Hospital. Defendant St. John Hospital and Medical Center furnishes lithotripsy to patients under arrangements with GLL.
- 197. Defendant St. Mary's of Michigan is a Michigan nonprofit corporation with a registered office at 800 S. Washington Avenue, Saginaw, MI 48601. Defendant St. Mary's of Michigan does business as St. Mary's Medical Center-Saginaw. Defendant St. Mary's of Michigan furnishes lithotripsy to patients under arrangements with GLL.
- 198. Defendant The Memorial Hospital is a Michigan nonprofit corporation with a registered office at 826 W. King Street, Owosso, MI 48867. Defendant The Memorial Hospital does business as Memorial Healthcare. Defendant The Memorial Hospital furnishes lithotripsy to patients under arrangements with GLL.

- 199. Defendant Trinity Health-Michigan is a Michigan nonprofit corporation with a registered office at 34605 W. 12 Mile Road, Farmington Hills, MI 48331. Defendant Trinity Health-Michigan does business as Chelsea Community Hospital, Mercy General Health Partners, Mercy Hospital Cadillac, Mercy Hospital, Port Huron, St. Joseph Mercy Oakland, St. Joseph Mercy Ann Arbor and St. Mary Mercy Hospital. Defendant Trinity Health-Michigan furnishes lithotripsy to patients under arrangements with GLL.
- 200. Defendant W. A. Foote Memorial Hospital is a Michigan nonprofit corporation with a registered office at 205 N. East Avenue, Jackson, MI 49201. Defendant W. A. Foote Memorial Hospital furnishes lithotripsy to patients under arrangements with GLL.
 - 201. The Defendant Mishawaka Urologists are Stephen P. Guss and Scott Rutchik.
- 202. Defendant Stephen P. Guss is an urologist, licensed to practice medicine in Indiana and, at all times relevant to the allegations of the complaint, one of the owners of Defendant UMS-Mishawaka. This defendant is a resident of the State of Indiana.
- 203. Defendant Scott Rutchik is an urologist, licensed to practice medicine in Indiana and, at all times relevant to the allegations of the complaint, one of the owners of Defendant UMS-Mishawaka. This defendant is a resident of the State of Indiana.
- 204. Defendant St. Joseph Community Hospital of Mishawaka is an Indiana nonprofit corporation with a registered office at 215 W. 4th Street, Mishawaka, IN 46544.
- 205. The Mishawaka Host Hospitals include St. Joseph Community Hospital of Mishawaka and any John Doe Defendant which is a hospital or ASC under contract with UMS-Mishawaka for the provision of lithotripsy services.

- 206. Defendant American Kidney Stone Management, Ltd. ("AKSM") is an Ohio limited liability company, headquartered at 797 Thomas Lane, Columbus, OH 483214, and with a registered office at 1300 East Ninth Street, Cleveland, OH 44144.
- 207. Defendant Greater Michigan Lithotripsy, LLC is a Delaware limited liability company ("GML") that is authorized to conduct business in Michigan and does conduct business in Michigan. Its registered office in Michigan is located at 30600 Telegraph Road, Suite 2345 Bingham Farms, MI 48025.
- 208. GML is owned by AKSM, Spectrum Hospital, William Beaumont Hospital and numerous physicians who specialize in the practice of urology. Each of the physician owners of GML is named as a Defendant in this case.
- 209. The "Defendant GML Urologists" include the defendants listed in paragraphs 210 through 306 and the John Doe Defendants who are physicians and who own, directly or indirectly, a membership interest in GML.
- 210. Defendant Henry Dale Alkema is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 211. Defendant John G. Anema is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors in Defendant GML individually and through Urological Consultants PSP/401K. This defendant is a resident of the state of Michigan.
- 212. Defendant Anthony N. Avallone is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 213. Defendant Edward E. Barton is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 214. Defendant Robert J. Bates is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and through an IRA. This defendant is a resident of the state of Michigan.
- 215. Defendant Glenn G. Betrus is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and through Urological Consultants PSP/401K is a resident of the state of Michigan.
- 216. Defendant Jayant D. Bhat is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 217. Defendant Dianne Bigham is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 218. Defendant Gregor W. Blix is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 219. Defendant Jonathan Todd Bolthouse is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 220. Defendant James B. Bour is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 221. Defendant Kevin Brewton is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 222. Defendant Todd Garrison Campbell is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and as trustee of the Grosse Pointe Urologic Surgeons Money Purchase Plan FBO Todd G. Campbell. This defendant is a resident of the state of Michigan.
- 223. Defendant George G. Carothers is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 224. Defendant Jeffrey B. Casamento is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 225. Defendant Jeffrey P. Chapman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 226. Defendant Randy M. Chudler is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 227. Defendant Lucy A. Coccimiglio is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 228. Defendant Thomas A. Coury is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 229. Defendant William Davidson is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 230. Defendant Willard P. Debraber is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 231. Defendant Ananias C. Diokno is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 232. Defendant Brian Drabik is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and as trustee of the Brian Drabik, DO. PC PSP. This defendant is a resident of the state of Michigan.
- 233. Defendant Caleb John Fleming is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 234. Defendant Anthony Raymond Gauthier, Jr. is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 235. Defendant Sity M. Girgis is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 236. Defendant Kenneth A. Goldman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 237. Defendant Arthur L. Golin is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 238. Defendant Jose A. Gonzalez is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 239. Defendant Douglas H. Green is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 240. Defendant Jeffrey Lorenz Greski is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 241. Defendant Mark L. Hammel is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 242. Defendant Philip T. Hoekstra is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and as trustee of the Phillip and Sharon Hoekstra Family Trust. This defendant is a resident of the state of Michigan.
- 243. Defendant Jay B. Hollander is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 244. Defendant Patrick M. Hurley is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 245. Defendant Robert R. Isacksen is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 246. Defendant Farid Jano is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 247. Defendant Richard Kahnoski is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 248. Defendant Marshall Kamer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 249. Defendant Evan J. Kass is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 250. Defendant David James Kearney is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 251. Defendant Charles M. Keoleian is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 252. Defendant John Harrison Kopchick is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 253. Defendant Howard J. Korman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 254. Defendant Joel M. Kriegel is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors in Defendant GML invidually and as trustee of the Red Fox Investment, LLC. This defendant is a resident of the state of Michigan.

- 255. Defendant Kevin Michael Kronner is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 256. Defendant Randall S. Kuntzman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 257. Defendant Leonard J. Kurello is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 258. Defendant Zvi Levran is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 259. Defendant Kenneth Lim is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 260. Defendant John Rohan Lobo is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 261. Defendant Jay Matthew Lonsway is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 262. Defendant Mark A. Lucas is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 263. Defendant John K. Ludlow is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 264. Defendant Michael D. Lutz is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 265. Defendant Thomas J. Maatman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 266. Defendant Willaim E. Marquis is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 267. Defendant William J. McDevitt is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 268. Defendant Mark C. McQuiggan is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 269. Defendant Thomas Mertz is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML

individually and as trustee of the Grosse Pointe Urologic Surgeons Money Purchase Pension Plan.

This defendant is a resident of the state of Michigan.

- 270. Defendant Donald F. Moylan, Jr. is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 271. Defendant Pradeep Nagaraju is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 272. Defendant Michael E. Novak is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 273. Defendant Kenneth M. Peters is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 274. Defendant Ashok Y. Reddy is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 275. Defendant James D. Relle is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 276. Defendant Louis C. Remynse is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 277. Defendant Stephen B. Reznicek is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 278. Defendant Paul N. Rodriguez is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 279. Defendant Hector Y. Rodriguez is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 280. Defendant Brian A. Roelof is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and as trustee of the Urologic Consultants PSP/401K. This defendant is a resident of the state of Michigan.
- 281. Defendant Bradley H. Rosenberg is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 282. Defendant Ronald Allen Rubenstein is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 283. Defendant Joseph A. Salisz is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 284. Defendant Brian D. Seifman is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 285. Defendant Sugandh D. Shetty is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 286. Defendant Kenneth F. Shockley is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 287. Defendant Larry T. Sirls is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 288. Defendant Thompson H. Southwell is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 289. Defendant James B. Smith is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 290. Defendant William F. Spencer is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.

- 291. Defendant George Steinhardt is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 292. Defendant Kevin T. Stone is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 293. Defendant Brian Robert Stork is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 294. Defendant Phillip B. Storm is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 295. Defendant Patrick J. Sweeney is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.
- 296. Defendant Dinesh John Telang is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the investors of Defendant GML individually and through Grosse Pointe Urologic Surgeons Money Purchase Pension Plan. This defendant is a resident of the state of Michigan.
- 297. Defendant David Edward Thompson is an urologist, licensed to practice medicine in Michigan, and, at all times relevant to the allegations of the complaint, one of the owners of Defendant GML. This defendant is a resident of the state of Michigan.